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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
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12)	No. CV-07-01819-CW
13)	No. MDL 1819-CW
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20 STIPULATION AND ~~PROPOSED~~ ORDER TO STAY
21 ALL DEPOSITION AND INTERROGATORY DISCOVERY
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27 PROPOSED ORDER RE: MOTION TO STAY
28 CV-07-01819-CW
MDL 1819-CW

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
LITIGATION

No. CV-07-01819-CW
No. MDL 1819-CW

STIPULATION AND ~~PROPOSED~~ ORDER TO STAY
ALL DEPOSITION AND INTERROGATORY DISCOVERY

On this date, the Court considered the MOTION BY THE UNITED STATES TO STAY ALL DEPOSITION AND INTERROGATORY DISCOVERY. The Court finds that the public's interest in an ongoing related criminal grand jury investigation outweighs the interests of the parties in deposition and interrogatory discovery in this civil matter at this time.

It is therefore Ordered that the Motion be GRANTED. Deposition and interrogatory discovery are stayed until June 1, 2008, subject to a request by the United States to extend the stay. This order to stay does not apply to discovery by defendants in connection with class certification proceedings; provided, however, that defendants shall not be allowed to take

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PROPOSED ORDER RE: MOTION TO STAY
CV-07-01819-CW
MDL 1819-CW

discovery of co-defendants.

Date: June 11, 2007

By /s/
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Attorneys for Hynix Semiconductor America,
Inc., and signing on behalf of all of the following
defendants who have entered an appearance in
this action, with express permission from their
counsel: Alliance Semiconductor Corporation,
Cypress Semiconductor Corporation, Epson
America, Inc., Epson Eletronics America, Inc.,
Etron Technology, Inc., Etron Technology America,
Inc., Integrated Silicon Solution, Inc., Fujitsu Ltd.,

PROPOSED ORDER RE: MOTION TO STAY
CV-07-01819-CW
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U. S. DEPARTMENT OF JUSTICE

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1 GSI Technology, Inc., Hitachi America, Ltd.,
2 Integrated Device Technology, Inc., Micron
3 Technology, Inc., Micron Semiconductor
4 Products, Inc. (including Crucial Technology,
5 an unincorporated division), Mitsubishi Electric
6 & Electronics USA, Inc., NEC Electronics
7 America, Inc., Renesas Technology America,
8 Inc., Samsung Semiconductor, Inc., Sharp
9 Electronics Corporation, Sony Corporation of
10 America and Sony Electronics Inc.,
11 STMicroelectronics, Inc., Toshiba America,
12 Inc., Toshiba America Electronic Components,
13 Inc., and Winbond Electronics Corporation
14 America

15 IT IS SO ORDERED

16 June 12

17 Date: _____, 2007



United States District Court Judge